

HAMMERMAN ROSEN LLP

Marvin J. Hammerman, Esq.
585 U.S. 46
Fairfield, New Jersey 07004 Telephone (973) 227-
1415
Facsimile (201) 781-5682
Attorneys for Defendant, McKaila Coulter

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

CHIRSTOPHER TORRE

Plaintiff,

-vs-

CHRISTINA KARDOONI and MCKAILA
COULTER
Defendants

²²
Civil Action No.: 2:1~~6~~-cv-04693-SDW-MAH
Judge Susan D. Wigenton, Presiding
Judge Michael A. Hammer, Referral

DECLARATION OF MCKAILA COULTER

Date: November 7, 2022

Time: 9:00 a.m.

Oral Argument Requested

I, McKaila Coulter, pursuant to 28 U.S.C. § 1746 hereby declare as follows:

1. I am a named Defendant in the above-referenced matter, I make this declaration based upon my personal knowledge.

2. My current address is 1A Warwick Street, Massachusetts, 02740. I was served with Plaintiff's Complaint on August 8, 2022 at the above address.

3. I am originally from Massachusetts.

4. I have never lived in any other State.

5. I have never resided in or been domiciled in the State of New Jersey.

6. I have never worked in the State of New Jersey.

7. I dated Plaintiff from May 2015 through October 2018.

8. During that relationship I lived in Massachusetts and Plaintiff lived in New York State, and, on occasion, he would live in Massachusetts with me. During our relationship, I was subjected to mental and physical abuse, including being choked against a wall. Attached as **Exhibit A** is a true and accurate screenshot of an Instagram message between myself and the Plaintiff showing his half-heartedly apology for that incident. None of the domestic incidents of abuse I suffered at Plaintiff's hands occurred in New Jersey.

9. Though I have travelled to and through the State of New Jersey, I have not been in New Jersey for four (4) years and then only for personal reasons such as to enjoy a day at the beach or to pass through to reach other more southern destinations within our country.

10. I have only been to New Jersey a few times in my life, with the last time being in early September 2018, where, upon information and belief, I passed with the Plaintiff through New Jersey to attend a show where Defendant performed in Maryland. Though it was years and years ago, upon information and belief, I may have attended one (1) or two (2) other performances of the Plaintiff within the State of New Jersey, but I barely recollect same. During the time I dated the Plaintiff, he regularly performed in wrestling "matches" all over the country.

11. I have no other connection to the State of New Jersey, no family, nothing I believe that would actually create a connection between me and the State of New Jersey.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment. I also certify that a true and accurate copy of each document referenced above is attached to this certification.

Sep 26, 2022


McKaila Coulter (Sep 26, 2022 13:09 EDT)

McKaila Coulter

Declaration of Coulter - Motion to Dismiss 1 - Coulter

Final Audit Report

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"Declaration of Coulter - Motion to Dismiss 1 - Coulter" History







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EXHIBIT A

9/26/22, 12:42 PM

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